

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

Mail Processing Network :  
Rationalization Service : Docket No. N2012-1  
Changes, 2012 :

GREETING CARD ASSOCIATION FOLLOWUP INTERROGATORIES TO  
POSTAL SERVICE WITNESS NERI

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the  
Greeting Card Association herewith submits interrogatories and requests for pro-  
duction of documents; specifically:

Followup interrogatories to Postal Service witness Neri:

GCA/USPS-T4-17 to -24

The term "documents" includes, without limitation, letters, telegrams,  
memoranda, reports, studies, articles from periodicals, speeches, testimonies,  
books, pamphlets, tabulations, and workpapers. In terms of format, "documents"  
includes written or printed records and disks, tapes, or other recorded media (to-  
gether with such written material as is necessary to understand and use such  
disks, tapes, or other media).

February 17, 2012

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T4-17

In your response to GCA/USPS-T4-1, the question referenced “declining volume in First Class Mail”, and your answer to part (a) was that “up until 2006, volumes were growing.”

(a) For each of (i) through (iv), below, please state the year in which the category of mail peaked:

- (i) Total First-Class Mail;
- (ii) Total First-Class Letter Mail;
- (iii) Single-Piece First-Class Letter Mail;
- (iv) Workshared First-Class Letter Mail.

(b) For each of (a)(i) through (a)(iv), please state the source of the data on which you rely to identify the peak year.

(c) Please state the net amount of First-Class Mail and First-Class Letter Mail processing equipment capacity added by the Postal Service since FY 2001.

(d) Please state the net amount of mail processing equipment capacity, including but not limited to facing and cancellation equipment, added by the Postal Service since 1990.

(e) Please refer to your answer in GCA/USPS-T4-1(a), referring to the use of excess capacity to “accommodate the volume growth.” Was the volume growth that you refer to growth in worksharing First-Class Letter Mail alone? If your answer is not an unqualified “yes,” please explain fully.

(f) If your answer to (e) was affirmative in any degree, please explain (i) whether the Postal Service was adding further capacity, up to 2006-2007, when worksharing activity for all upstream processing was increasing (presumptively displacing the Postal Service's need to add capacity), and (ii) if so, why.

(g) If your answer to (e) was negative, please state what other categories of First-Class Mail besides workshared were growing in volume until 2006-2007.

GCA/USPS-T4-18

In your answer to GCA/USPS-T4-5(a), you use the phrase “performed on machinery capable of performing DPS.”

(a) What types of automation machinery, and what vintages of such machinery, are capable of doing a DPS sort?

(b) What vintages and types of automation machinery are not capable of doing DPS sorts?

(c) (i) Can older vintages of automation machinery be retrofitted to perform DPS sorts?

(ii) Have older vintages of automation machinery been retrofitted to perform DPS sorts?

(iii) If your answer to (i), (ii), or both, is affirmative in any degree, please list the type of machine, vintage, and description of the retrofitting (e.g., more bins, addition of DIOSS, etc.) which can be or has been done.

GCA/USPS-T4-19

In your answer to GCA/USPS-T4-6(b), you replied “Yes.” The question asked for full explanation of your answers. Please expand on your initial response to explain whether phasing in of DPS required purchasing all new machinery (DBCS), or whether DPS was also phased in on existing BCS machines.

GCA/USPS-T4-20 Please refer to your answer to GCA/USPS-T4-7.

(a) Please define as precisely as possible the meaning of "unpredictable" as you have used it in this response.

(b) Please explain why there would be less unpredictable mail arrival in a processing plant if overnight delivery was ended.

(c) Please explain fully why adding an additional 24 hours for processing and delivering what is now overnight mail, would not, by reason of that very widening of the acceptable entry times, create more unpredictable mail arrival than the current narrower standard.

GCA/USPS-T4-21

(a) In your answer to GCA/USPS-T4-12(c), you state that the Postal Service has "announced publicly . . . its plan to implement network changes." Is the public announcement to which you referred the December 15, 2011, Federal Register notice filed as Library Reference LR-N2012-1/7 in this case? If you were referring to any other public announcement(s), please fully identify them, with dates.

(b) Did all, or any, of the public announcements of plans to implement network changes you identify in responding to (a) include, or assume as a necessary part of the network changes, the ending of overnight delivery? Please identify all that did include or assume that feature.

(c) (i) Were any plans to implement network changes which did include or assume the ending overnight delivery furnished to witness Rosenberg before she performed the analysis now presented in USPS-T-3?

(ii) If so, were these plans furnished as forming a necessary or recommended basis for her analysis (as opposed, e.g., to a possible but not necessarily preferred outcome thereof)? Please explain fully.

GCA/USPS-T4-22

Please refer to your answer to GCA/USPS-T4-12(c).

(a) Does the expression "implementation timeline as brought forth in this docket" refer to the start of network rationalization (most recently given, in the Postal Service's January 18, 2012, Motion for Reconsideration, as May 15, 2012), to the completion of that rationalization, or to some other period of time? Please explain fully.

(b) If the above-cited "implementation timeline" was meant to refer to some period of or point in time other than the start of network rationalization, what is your best projection of the date of completion of the rationalization?

(c) In assigning "adequate resources to meet its objectives," will the Postal Service seek to conduct all the required AMP processes simultaneously, or will a staff unit which has completed an AMP process then be assigned to start on a new one? Please explain fully.

GCA/USPS-T4-23

(a) With respect to your answer to GCA/USPS-T4-14, does the Postal Service already have data on the volume of overnight First-Class Letter Mail processed and delivered for each day of the year, Monday through Saturday?

(b) If your answer to (a) is not an unqualified "no," please confirm that most of the predictability of daily processing requirements is already contained in the available data, or can be inferred from statistical tests on that data. If you do not confirm, please explain why.

GCA/USPS-T4-24

In your response to GCA/USPS-T4-15, you state that collection mail cannot meet the new service standards for overnight delivery published in the Federal Register on December 15<sup>th</sup> because it cannot meet the 8:00 a.m. or 12 a.m. arrival cut-off times for Presort.

(a) Please explain fully why collection mail cannot be picked by USPS personnel up at times that would allow it to meet the same entry times as required for Presort.

(b) (i) Does your answer to GCA/USPS-T4-15 mean that the entry times and corresponding delivery standards for Presort First-Class Mail were established, and the delivery standards for Single-Piece then derived as a consequence of those parameters for Presort? Please explain fully either an affirmative or a negative answer.

(ii) If your answer to (i) is that Presort entry and delivery standards did, in any degree, dictate those for Single-Piece, please explain how and why the decision to proceed in that manner was taken.

(c) Was any optimization study for entry times undertaken which attempted to balance the needs of Presort and Single Piece for overnight delivery, (i.e., an optimization study leading to a solution showing what entry times for Presort and Single Piece simultaneously allowed for overnight delivery of both (even if not at the current volumes))? If yes, please provide a copy of all such studies, or a citation thereto if already publicly available. If not, please explain why such a study was not conducted.